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12 *Austson Arbi*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 AUSTSON ARBI,

16 vs. Plaintiff,

17 SYNERGY USA LLC, et al.,

18 Defendants.

19 CASE NO.: 2:23-cv-01998- CDS-NJK

20 **JOINT REQUEST, STIPULATION
21 AND ~~PROPOSED~~
22 ORDER FOR EXTENSION OF
23 DISCOVERY DEADLINES**

24 **(FIRST REQUEST)**

25 Pursuant to Local Rule (“Local Rule”) IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff *Austson Arbi*
26 (“Plaintiff”) and **ALL** Defendants (collectively “Defendants”), by and through their respective
27 undersigned counsel, hereby stipulate to extend the deadlines as enumerated in the parties’ Discovery
28 Plan and Scheduling Order (EFC No. 12) by ninety (90) days, effective June 11, 2024. This is the
first request for an extension of all deadlines by the parties and is not being made for the purpose of
delay.

29 **I. Discovery Completed To Date.**

30 Defendants and Plaintiff served their Initial Disclosures on December 28, 2023. Plaintiff served his
31 first sets of Request for Admissions, Request for Production of Documents, and Interrogatories to

1 Defendant Synergy on Thursday, December 28, 2023. Defendants served their first sets of Request for
 2 Admissions, Request for Production of Documents, and Interrogatories to Plaintiff on Friday, March
 3 29, 2024.

4 **II. Remaining Discovery To Be Completed.**

5 Formal written discovery to other named Defendants, physical inspection of documents,
 6 third party subpoena(s), depositions of parties, and percipient witnesses have yet to be conducted.

7 **III. Reason Discovery Cannot Be Completed Within the Original Deadline, Good Cause.**

8 The parties believe good cause exists for their request to be granted. The parties continue the
 9 meet and confer process to resolve significant discovery disputes. Resolution of current discovery
 10 disputes will determine if discovery is needed from third parties, via subpoena(s), as well as the need
 11 for formal written discovery from other named Defendants, and when and how depositions will be
 12 taken. Additionally, Plaintiff's attorney, Ms. Neal, was hospitalized on April 30, 2024, for eight (8)
 13 days for a serious health condition. Ms. Neal has returned to work on a part-time basis while she
 14 undergoes treatments.

15 To conduct discovery in the most efficient manner, the parties have agreed that a 90-day
 16 extension of discovery deadlines is necessary effective June 11, 2024.

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cutoff	Tuesday, June 11, 2024	Monday, September 9, 2024
Dispositive Motions	Thursday, July 11, 2024	Wednesday, October 9, 2024
Pretrial Order	Monday, August 12, 2024	November 10, 2024
Fed. R. Civ. P. 26(a)(3) Disclosures:	Thursday, July 11, 2024	Tuesday, November 12, 2024 (11/10 is a Sunday, 11/11 is a holiday)

1 Respectfully submitted and dated this 16th day of May 2024,

2 /s/ Victoria L. Neal

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IT IS SO ORDERED.

Dated: May 17, 2024.


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UNITED STATES MAGISTRATE JUDGE
NANCY J. KOPPE